

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

MATTHEW J. PLATKIN, et al.

Plaintiffs,

v.

REALPAGE, INC., et al.

Defendants.

Civil Action No. 2:25-cv-03057  
(MCA-JSA)

*Filed Electronically*

**STIPULATION AND ~~PROPOSED~~ ORDER REGARDING BRIEFING SCHEDULE  
AND PAGE LIMITS FOR MOTIONS TO DISMISS**

Plaintiffs Matthew J. Platkin, Attorney General of the State of New Jersey, and Elizabeth Harris, Acting Director of the New Jersey Division of Consumer Affairs (together, “Plaintiffs”) and Defendants RealPage, Inc. (“RealPage”); Morgan Properties Management Company, LLC; AvalonBay Communities, Inc.; LeFrak Estates, L.P. (“LeFrak”); Greystar Management Services, LLC (“Greystar”); AION Management, LLC; Cammeby’s Management Co. of New Jersey L.P. (“Cammeby’s”); Veris Residential, Inc.; Russo Development, LLC, and Russo Property Management, LLC (together, “Russo”); The Kamson Corporation (“Kamson”); and Bozzuto Management Company (collectively “Defendants,” and together with Plaintiffs, “Parties”) hereby submit the following stipulation regarding the briefing schedule and page-limits for Defendants’ anticipated Motions to Dismiss Plaintiffs’ Complaint:

WHEREAS, Plaintiffs initiated this action on April 23, 2025, by filing a redacted copy of the Complaint publicly and an unredacted copy of the Complaint under seal (the “Complaint”);

WHEREAS, of the eleven Defendants remaining in the case (counting Russo as a single Defendant), nine anticipate responding to the Complaint through a Joint Motion to Dismiss (the “Joint Motion to Dismiss”);

WHEREAS, three of those nine Defendants also anticipate responding to the Complaint with short supplemental individual or joint briefs (the “Supplemental Briefs”) addressing certain allegations and claims, as set forth in the Complaint, that are specific to those individual Defendants;

WHEREAS, the remaining two Defendants anticipate filing their own separate Motions to Dismiss (the “Separate Motions to Dismiss”, and together with the “Joint Motion to Dismiss” and the “Supplemental Briefs”, the “Motions to Dismiss”) in accordance with the Local Rules;

WHEREAS, on June 5, 2025, the Court entered the Parties’ stipulation, which ordered that all Defendants’ responses to the Complaint be filed on or before July 15, 2025 (D.E. 29);

WHEREAS, the Parties have agreed to extend the deadline for all Defendants to respond to the Complaint until July 29, 2025;

WHEREAS, the Parties have agreed to a joint proposed briefing schedule for the Motions to Dismiss;

WHEREAS, the Parties agree that additional pages beyond those provided under Local Civil Rule 7.2 are necessary to fully present the issues that are expected to be jointly raised and addressed in the Joint Motion to Dismiss;

WHEREAS, the Parties agree that the Supplemental Briefs shall not exceed 15 pages in double-spaced 12-point proportional font (or the equivalent length in double-spaced 12-point non-proportional font or 14-point proportional font); and

WHEREAS, the Parties agree that the briefing filed in connection with the Separate Motions to Dismiss shall be subject to the page limitations provided under Local Civil Rule 7.2;

IT IS HEREBY STIPULATED AND AGREED, among the Parties, subject to the Court’s approval, as follows:

1. The Parties agree to the following schedule for the Motions to Dismiss:
  - i. Defendants will file the Joint Motion to Dismiss, the Supplemental Briefs, and the Separate Motions to Dismiss on or before July 29, 2025;
  - ii. Plaintiffs will file their oppositions to the Motions to Dismiss on or before September 30, 2025;
  - iii. Defendants will file their replies in support of the Motions to Dismiss on or before October 30, 2025; and
  - iv. The Parties respectfully request that the Court hold a hearing on the Motions to Dismiss at its earliest convenience.

2. The opening brief in support of the Joint Motion to Dismiss shall be no more than 40-pages double-spaced 12-point proportional font; the opposition brief to the Joint Motion to Dismiss shall be no more than 40-pages double-spaced 12-point proportional font; and the reply brief to the Joint Motion to Dismiss shall be no more than 20-pages double-spaced 12-point proportional font.<sup>1</sup>

3. Opening Supplemental Briefs shall be no more than 15 pages double-spaced 12-point proportional font; opposition briefs in response shall be no more than 15 pages double-spaced 12-point proportional font; and reply briefs shall be no more than 8 pages double-spaced 12-point proportional font.

4. All briefing on the Separate Motions to Dismiss shall be subject to the page limitations provided under Local Civil Rule 7.2

IT IS SO STIPULATED:

Dated: July 3, 2025

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<sup>1</sup> The Parties agree that for any of the page limits set forth in this Stipulation, the equivalent page limits set forth in Local Civil Rule 7.2 shall be used for any of the alternative font sizes as set forth by the Rule.

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SO ORDERED this 7<sup>th</sup> day of July, 2025.

  
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THE HONORABLE JESSICA S. ALLEN  
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